

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ELIZABETH THOMAS
Plaintiff

v.

MERITAGE HOMES CORPORATION
f/k/a Meritage Corporation, f/k/a Legacy
Monterey Homes LP; MERITAGE
HOMES OF TEXAS LLC f/k/a/
Meritage Homes of Texas LP f/k/a
Legacy Monterey Homes LP; MTH
LENDING GROUP L.P.; PRIMARY
RESIDENTIAL MORTGAGE INC.;
MARY A. LESTER; and STEWART
TITLE COMPANY Cause No. 20116-
87941

Defendants

CAUSE NO. 2017-76078

ELIZABETH THOMAS
Plaintiff

v.

MERITAGE HOMES CORPORATION
f/k/a Meritage Corporation, f/k/a Legacy
Monterey Homes LP; MERITAGE
HOMES OF TEXAS LLC f/k/a/
Meritage Homes of Texas LP f/k/a
Legacy Monterey Homes LP; MTH
LENDING GROUP L.P.; PRIMARY
RESIDENTIAL MORTGAGE INC.;
MARY A. LESTER; and STEWART
TITLE COMPANY;

Defendants

CAUSE NO. 2017-82388

ELIZABETH THOMAS
Plaintiff

v.	§
	§
MERITAGE HOMES OF TEXAS LLC	§
f/k/a/ Meritage Homes of Texas LP f/k/a	§
Legacy Monterey Homes and	§
STEWART TITLE GUARANTY	§
Defendants	§
	§

CAUSE NO. 2017-04089

MIRAMAR LAKE HOMEOWNERS	§
ASSOCIATION, INC.	§
Plaintiffs	§
v.	§
	§
ELIZABETH THOMAS	§
Defendants	

**SUGGESTION OF BANKRUPTCY AND NOTICE OF
STAY AS TO THESE PROCEEDINGS,**

PLEASE TAKE NOTICE, that on August 12, 2024, James M. Andersen filed an Chapter 13, Petition (the "Petition Date"), for relief under Title 11 of the United States Code, 11 U.S.C. §§ 101et seq. (the "Bankruptcy Code") in the United States Bankruptcy Court Southern District of Texas commencing bears Case No. 24-80232 and invoking the automatic stay **See Exhibit A**. Andersen Co-Debtors include Elizabeth Thomas. See Exhibit B.

1. Pursuant to Section 362 of the Bankruptcy Code, the filing of the Petition operates as a stay of:

- a. The commencement or continuation, of a proceeding against the Debtor that was or could have been commenced before the commencement of the case under this Title, or to recover a claim against the Debtor that arose before the commencement of the case under this Title;

- b. The enforcement, against the Debtor or against property of the estate, of a judgment obtained before the commencement of the case under this Title;
 - c. ***Any act to obtain possession of property of the estate or property from the estate;***
 - d. Any act to create, perfect, or enforce any lien against property of the estate;
 - e. Any act to create, perfect, or enforce against property of the Debtor any lien to the extent that such lien secures a claim that arose before the commencement of the case under this Title, except to the extent provided in section 362(b);
 - f. ***Any act to collect assets, or recover a claim against the Debtor that arose before the commencement of the case under this title;***
 - g. The set off of any debt owing to the Debtor that arose before the commencement of the case under this Title against any claim against the Debtor; and
 - h. The commencement or continuation of a proceeding before the United States Tax Court concerning the Debtor.
2. Accordingly, pursuant to the provisions of 11 U.S.C. §362, the automatic stay prohibits any further action against debtors or property of the bankruptcy estate in this proceeding until such time as the Bankruptcy Court may order otherwise.
5. In addition, pursuant to Section 108 of the Bankruptcy Code, the filing of the Petition operates to extend the period within which the Debtor may, among other things, file any pleading, commence an action, cure a default, or perform any other similar act fixed by non bankruptcy law, an order entered in a non-bankruptcy proceeding, or an agreement, if such deadline has not expired prior to the filing of the

Petition.

Respectfully submitted,

THE JAMES M. ANDERSEN LAW FIRM

/s/James M. Andersen

James M. Andersen

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CERTIFICATE OF SERVICE

I certify that on August 19, 2024,. the foregoing document was served on Counsel of record via the Court's ECF electronic notification system.

/s/James M. Andersen